

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ELECTRONIC ENVIRONMENTS CORPORATION,

Plaintiff,

v.

Case No. 05-11093 NG

JAMES M. EMMING,

Defendant.

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DEFENDANT'S RULE 26(a)(1) INITIAL DISCLOSURES

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NOW COMES the Defendant, James M. Emming, by his attorneys, Axley Brynelson, LLP, by Lori M. Lubinsky, and pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, submits the following Initial Disclosures.

1. Rule 26(a)(1)(A) Disclosure. Defendant discloses the following individuals likely to have discoverable information that defendant may use to support his claims or defenses in this matter:

- a. James M. Emming, 114 Vauxhall Street, New London, CT 06320.
- b. Peter Drumm, JT Packard & Associates, Inc., 275 Investment Court, Verona, WI 53593.
- c. Kenneth Rapoport, CEO, Electronic Environments Corporation, 410 Forest Street, Marlborough, MA 01752.
- d. James Peltier, Electronic Environments Corporation, 410 Forest Street, Marlborough, MA 01752.
- e. Glenn Paulson, Northeast Regional Manager, JT Packard & Associates, Inc., 275 Investment Court, Verona, WI 53592.

- f. Al Resendes, Electronic Environments Corporation, 410 Forest Street, Marlborough, MA 01752.

2. Rule 26(a)(1)(B) Disclosure. Defendant may use the following category of documents and tangible things to support his defenses:

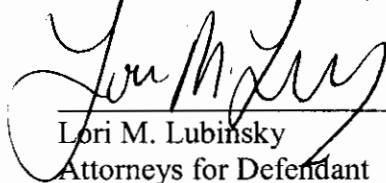
- a. Documents relating to defendant's employment with Electronics Environments Corporation, including, but not limited to, personnel documents, offers of employment, performance reviews, promotion-related documents, correspondence, and other miscellaneous documentation.
- b. Documents relating to defendant's employment with JT Packard & Associates, Inc., including, but not limited to, offers of employment, personnel and performance records, and miscellaneous communications.

3. Rule 26(a)(1)(C) Disclosure. No damages are being sought by defendant.

4. Rule 26(a)(1)(D) Disclosure. Defendant is not aware of any insurance agreement that may be applicable to this action

Dated this 26<sup>th</sup> day of August, 2005.

AXLEY BRYNELSON, LLP



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